

EXHIBIT 2

**Rebels v.
Blakeman
(Remand
Hours)**



ACLU of New York

| Person | Date | Description | Hours |
|----------------|-----------|--|-------|
| Robert Hodgson | | | |
| | 4/11/2024 | Review respondents' improperly filed removal notice in federal court (EDNY) | 0.50 |
| | 4/11/2024 | Call with GL, MB, CD re response to respondents' improper removal and related case statement in EDNY, next steps | 0.50 |
| | 4/11/2024 | Research re why respondents' removal is clearly improper under black letter law | 1.00 |
| | 4/12/2024 | Review EDNY court decision dismissing Blakeman v James action for removal/remand issue; relatedness; related questions | 0.30 |
| | 4/12/2024 | Review/edit draft letter for EDNY opposing relatedness and raising concerns of impropriety/improper procedure from Nassau | 0.50 |
| | 4/12/2024 | Review/edit draft emails to Nassau counsel re failure to notify, failure to file on NYSCEF, need to contact state court re removal | 0.50 |
| | 4/12/2024 | Research re motion to remand--black-letter law showing Nassau cannot remove here; procedure for motion | 1.00 |
| | 4/12/2024 | Meeting with GL, MB, JD re EDNY docket entries, case assignment, missing Nassau civil cover sheet, relatedness issues | 1.00 |
| | 4/12/2024 | Call EDNY clerk re procedural questions re removal, related case issues, procedure for next steps (to seek remand and oppose relatedness) | 0.50 |
| | 4/12/2024 | Review all of Nassau's improper filings in federal court | 1.00 |
| | 4/16/2024 | Review and edit GL draft of motion for remand and for fees | 1.70 |
| | 4/16/2024 | Meet with GL re motion to remand, fees issue, sanctions motion | 0.30 |
| | 4/17/2024 | Review of updated draft to GL MOL ISO motion to remand and for fees, edits | 0.50 |
| | 4/18/2024 | Review Order setting schedule on motion to remand and individual rules on reply | 0.10 |
| | 4/18/2024 | Final review/edits to MOL and Notice of motion to remand; review of individual judge and EDNY rules for filing | 0.50 |
| | 4/22/2024 | Review Nassau filing in EDNY motion to remand; confirm that they have not rescinded removal petition, effect of "mootness" (no effect), next steps | 0.50 |
| | 4/22/2024 | Teams messages with GL re our reply, timing, timing of procedural history, outline for reply brief | 0.20 |
| | 4/23/2024 | Final review of reply, final polishing/edits | 0.20 |
| | 4/23/2024 | Review of GL draft reply ISO remand and fees; edits, shortening, key issues that weigh in our favor; inconsistency of their letter | 1.00 |
| | 4/25/2024 | Review Court decision granting motion to remand and fees/costs/expenses. | 0.20 |
| | 4/26/2024 | Meeting with GL re collecting fees, identifying expenses, following terms of federal court order re expenses and fees covered | 0.30 |

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| 5/8/2024 | Research re reasonable rates and time spent on remand motion in recent EDNY/SDNY cases | 1:00 |
| 5/8/2024 | Review/edit GL email re remand fees negotiation. | 0.10 |
| 5/8/2024 | Draft and file letter request for extension of time to file fees application in light of Nassau's new position | 0.20 |
| 5/8/2024 | Attempt to call opposing counsel re remand fees issue (VM) | 0.10 |
| 5/13/2024 | Additional research on EDNY and SDNY rates and hours spent on remand motion for fees. | 1.00 |
| 5/14/2024 | Review all exhibits to Hodgson affirmation ISO fees, rates, and hours (resumes, relevant experience) and cross-check with cited authorities | 1.00 |
| 5/14/2024 | Draft Hodgson affirmation ISO fees, rates, and hours | 2.00 |
| 5/14/2024 | Draft fees application MOL ISO rates and hours. | 3.00 |
| 5/15/2024 | Finalize declaration (facts asserted ISO fees, all relevant discussion of fees requested, correct math) | 1.00 |
| 5/15/2024 | Edit MOL in light of MB and GL edits, comments. Near-final draft. | 1.00 |
| 5/15/2024 | Review all billed hours for excessive/redundant/non-removal-related entries and remove from request | 0.50 |

Bobby Hodgson Total: 23.20